

December 13, 2018

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Via ECF

The Honorable Valerie E. Caproni Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: Gene Samit v. CBS Corporation, et al.

Consolidated Action No. 18-cv-07796 (VEC)

Dear Judge Caproni:

Pursuant to Local Civil Rule 1.4, Defendant Charles K. Gifford respectfully requests substitution of counsel in connection with the above-captioned matter. Attached as Exhibit A is a Stipulation and (Proposed) Order Regarding Substitution of Counsel. Attached as Exhibit B is the Declaration of Matthew M. Riccardi pursuant to Local Civil Rule 1.4

Subject to the approval of the Court, Lee S. Richards, Matthew M. Riccardi, and Andrew R. Podolin of Richards Kibbe & Orbe LLP will be substituted in the place of, and in the stead of, Mary Jane Eaton, Alexander L. Cheney, and Zeh S. Ekono of Willkie Farr & Gallagher LLP as attorneys for Defendant Charles K. Gifford.

Respectfully submitted,

Matthew M. Riccardi

cc: All Counsel of Record (via ECF)